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November 1, 2012

Ms. Ingrid H. Hopkins
Water Protection Division (3WP42)
US EPA – Region III
1650 Arch Street
Philadelphia, PA 19103-3029
(215) 814-5437
hopkins.ingrid@epa.gov

RE: Benning Road Generating Station – NPDES Permit No. DC 0000094
pH Excursion – Manhole K

Dear Ms. Hopkins,

This letter is a follow-up to the October 31, 2012 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff of HB Consulting LLC., to report a pH excursion from a grab storm water sample taken on October 28, 2012 from Manhole K.

On October 28, 2012 Ms. Brinkerhoff received the laboratory analysis indicating a grab storm water sample from Manhole K pH indicated an excursion of 5.4 (limit 6.4 - 8.5). Ms. Brinkerhoff made the required telephone notification per NPDES permit condition VI.6 to the USEPA.

Investigation of the low pH indicated the natural rainfall pH is the possible root cause. As you are aware, the storm water sample taken from this outfall does not combine with any other water (internal discharges or river water) – just pure rainwater. The pH of natural rainfall is generally about 5.1, as indicated by AMEC, the environmental consulting firm contracted to take storm water samples from Manhole 'K'. And more specifically, in the Washington DC area, the average pH's range from between 4.2 and 4.4 due to the effects of acid rain. Therefore, since there is no other water infiltrating the sample, the pH would be low. Also, since the rainfall runs over concrete surfaces, it is likely to pick up a bit of buffering capacity from the lime in the concrete, hence, the 5.44 reading.

Please contact me at (703) 253-1787 or by electronic mail at mwilliams@pepcoenergy.com if you need additional information.

Respectfully yours,

Michael V. Williams
Power Plant Asset Manager
Pepco Energy Services, Inc.

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